

**IN THE UNITED STATES OF AMERICA
BEFORE THE UNITED STATES COURT OF APPEALS FOR THE
DISTRICT OF COLUMBIA CIRCUIT**

AMPERSAND PUBLISHING, LLC, d/b/a)	
<i>SANTA BARBARA NEWS-PRESS</i>)	
)	
PETITIONER,)	
)	CASE No. 15-1074
v.)	
)	
NATIONAL LABOR RELATIONS BOARD)	
)	
RESPONDENT)	
)	
AND)	
)	
GRAPHICS COMMUNICATIONS CONFERENCE)	
INTERNATIONAL BROTHERHOOD OF TEAMSTERS)	
)	
INTERVENOR¹)	
)	

**MOTION FOR AN EXTENSION OF TIME TO FILE APPELLANT’S OPENING
BRIEF**

COMES NOW, Ampersand Publishing, LLC, d/b/a *Santa Barbara News-Press*, pursuant to FRAP 27, and Circuit Rule 27(h), with this Motion for an Extension of Time to File Appellant’s Opening Brief in the above-named and numbered action. On June 8, 2015, the court issued a briefing schedule with a date of July 20, 2015, as the date for Ampersand to file its

¹ Motion to Intervene pending.

Opening Brief and Appendix. For the following reasons Ampersand respectfully requests that the briefing schedule be extended to **September 21, 2015** to file the Opening Brief and Appendix:

- 1) This is a remarkably large record for an NLRB appeal. The transcript is over 3,500 pages, and there are over 700 exhibits. The hearing lasted 21 days. Adequate time is necessary to properly evaluate the voluminous record and present cogent arguments on appeal.
- 2) The certified index of the record is not complete. Counsel to Ampersand has contacted the General Counsel about creating the full record. Counsel to Ampersand believes it has copies of the missing exhibits which can be used to supplement the certified index of the record.
- 3) Personal and professional obligations of counsel in the next two months include collective bargaining negotiations the week of June 22, 2015; collective bargaining negotiations the week of July 20, 2015; and arbitration the week of August 14, 2015; briefs due in the Supreme Court of New York, 3rd Department on June 26, 2015 and August 4, 2015; and a brief due on July 2, 2015 in the California Court of Appeals, Second District, in a complex class action appeal; as well as booked vacations.

4) Counsel to Ampersand has contacted the counsel to the NLRB who does not oppose this Request for an Extension of Time.

5) Counsel to Ampersand has contacted counsel to the intervening Union, who does not oppose this Request for an Extension of Time.

This Motion is not made for purposes of delay. Rather, this Motion is made in order to give proper time and consideration to the record to properly present the case to this court.

WHEREFORE, Ampersand respectfully requests that the deadline for the submission of the Respondent's Opening Brief and Appendix be moved to **September 20, 2015**, for the reasons explained in this motion.

DATED: June 24, 2015

Nashville, Tennessee

Respectively submitted,

/s/ L. Michael Zinser
L. Michael Zinser

/s/ Glenn E. Plosa
Glenn E. Plosa

THE ZINSER LAW FIRM, P.C.
414 Union Street, Suite 1200
Nashville, Tennessee 37219
Telephone: (615) 244-9700
Facsimile: (615) 244-9734

CERTIFICATE OF SERVICE

I hereby certify that the foregoing MOTION FOR AN EXTENSION OF TIME TO FILE APPELLANT'S OPENING BRIEF was filed electronically with the Court's CM/ECF system and served upon the addresses described below this 24th day of June 2015:

Linda Dreeben
National Labor Relations Board
1099 14th Street, N.W.
Washington, D.C. 20570

Ira L. Gottlieb
Bush Gottlieb Singer Lopez Kohanski Adelstein & Dickinson
500 North Central Avenue, Suite 800
Glendale, CA 91203

/s/ Glenn E. Plosa
Glenn E. Plosa